

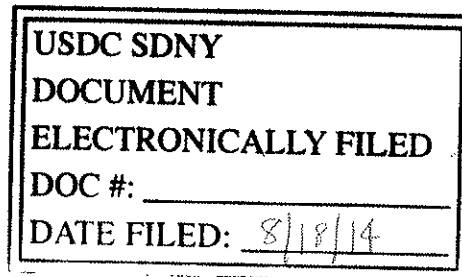
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August 18, 2014

VIA EMAIL (brodericknysdchambers@nysd.uscourts.gov)
Hon. Vernon Broderick
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007



Re: In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig., MDL No. 2542

Dear Judge Broderick:

This firm is counsel to Defendant Keurig Green Mountain, Inc. ("Keurig") in the above-referenced action. Pursuant to Your Honor's Individual Rules of Practice 5(B) and 1(A), and the Protective Order entered by the Court on June 6, 2014 (No. 14 Civ. 905, ECF No. 49), Keurig respectfully requests leave to file the highlighted portions of the attached letter from Wendelynnne J. Newton and accompanying exhibits (the "Letter") under seal. Exhibits A-C would be redacted in their entirety. Exhibits D and E would not be sealed.¹

The Letter is in response to the August 16, 2014 letter of Plaintiff JBR, Inc. (d/b/a Rogers Family Company) ("Rogers"), portions of which Rogers has requested to file under seal. The Letter references and attaches documents designated by Keurig as "Highly Confidential" under the Protective Order because they are the subject of reasonable efforts to maintain secrecy, could afford an advantage over others, and because their disclosure would cause material injury to Keurig. Accordingly, Keurig's interests warrant filing the Letter under seal. *See generally* *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006).

Application Granted.

SO ORDERED:

Vernon Broderick 8/18/14

U.S.D.J.

cc (via email): all counsel of record

Respectfully submitted,

s/ Wendelynnne J. Newton

Wendelynnne J. Newton

¹ Exhibits to be sealed in their entirety are marked "HIGHLIGHTED" in the file name, and separate loose leaf versions have been omitted.